

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION

UNITED STATES OF AMERICA ) DOCKET NO. 1:20-CR-60-MR-WCM  
 )  
 VS. ) FACTUAL BASIS  
 )  
 AMANDA DALE TRULL )  
 \_\_\_\_\_ )

NOW COMES the United States of America, by and through R. Andrew Murray, United States Attorney for the Western District of North Carolina, and hereby files this Factual Basis in support of the plea agreement filed simultaneously in this matter.

This Factual Basis is filed pursuant to Local Criminal Rule 11.2 and does not attempt to set forth all of the facts known to the United States at this time. By their signatures below, the parties expressly agree that there is a factual basis for the guilty plea(s) that the defendant will tender pursuant to the plea agreement, and that the facts set forth in this Factual Basis are sufficient to establish all of the elements of the crime(s). The parties agree not to object to or otherwise contradict the facts set forth in this Factual Basis.

Upon acceptance of the plea, the United States will submit to the Probation Office a "Statement of Relevant Conduct" pursuant to Local Criminal Rule 32.4. The defendant may submit (but is not required to submit) a response to the Government's "Statement of Relevant Conduct" within seven days of its submission. The parties understand and agree that this Factual Basis does not necessarily represent all conduct relevant to sentencing. The parties agree that they have the right to object to facts set forth in the presentence report that are not contained in this Factual Basis. Either party may present to the Court additional relevant facts that do not contradict facts set forth in this Factual Basis.

1. From at least as early as October 2015 and continuing on or about January 19, 2017, in Buncombe County within the Western District of North Carolina and elsewhere, the defendant, Amanda Dale TRULL did knowingly and intentionally conspire and agree with other persons, known and unknown to the United States, to distribute and to possess with intent to distribute a controlled substance, that is, a mixture and substance containing a detectable amount of 3,4-Methylenedioxymethamphetamine, also known as “MDMA” and “Ecstasy,” a Schedule I controlled substance.

2. On or about January 19, 2017 in Buncombe County within the Western District of North Carolina and elsewhere, Amanda Dale TRULL did knowingly and intentionally possess with intent to distribute a controlled substance, that is, a mixture and substance containing a detectable amount of 3,4-Methylenedioxymethamphetamine, also known as "MDMA" and "Ecstasy," a Schedule I controlled substance.

R. ANDREW MURRAY  
UNITED STATES ATTORNEY



CHRISTOPHER S. HESS  
ASSISTANT UNITED STATES ATTORNEY

Defendant's Counsel's Signature and Acknowledgment

I have read this Factual Basis and the Bill of Information in this case, and have discussed them with the defendant. Based on those discussions, I am satisfied that the defendant understands the Factual Basis and the Bill of Information. I hereby certify that the defendant does not dispute this Factual Basis.

  
Mary Ellen Coleman, Attorney for Defendant

DATED: 6/30/20